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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Michele Santopietro, an Individual,

Plaintiff,

v.

Las Vegas Police Department Officers C.
Howell (Badge 9634), F. Lopez-Rosende
(Badge 8864), and K. Crawford (Badge
10050),

Defendants.

CASE NO. 2:12-cv-01648-JCM-PAL

**JOINT MOTION TO EXTEND TIME
TO FILE JOINT PRETRIAL ORDER**

(Second Request)

The Parties, by and through their respective counsel, jointly move to modestly extend the deadline to file a joint pretrial order pursuant to the Court's March 25, 2024 Minute Order [ECF No. 84] from Thursday, April 4, 2024 to and including Wednesday, April 10, 2024. This Motion is based upon the Memorandum of Points and Authorities below, the papers on file, and any oral argument that the court chooses to hear.

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Pursuant to the Court's March 25, 2024 Minute Order [ECF No. 84], the current deadline to file a joint pretrial order is April 4, 2024. The Parties seek additional time of three additional court days to prepare the joint pretrial order up to and including April 10, 2024. This request is supported by good cause and is not for the purpose of delay. Counsel appreciates that

1 the Court has already allowed an extension and represent that they do not intend to seek
2 additional time beyond what is sought in the instant request.

3 **II. ARGUMENT**

4 The decision to grant an extension or continuance is within the sound discretion of the
5 trial court. *F.T.C. v. Gill*, 265 F.3d 944, 954-55 (9th Cir. 2001). Federal Rule of Civil Procedure
6 6(b)(1) provides that when an act must be done within a specified time, the Court “may, for good
7 cause, extend the time . . . with or without motion or notice if the court acts, or if a request is
8 made, before the original time or its extension expires” This Court should grant the Parties’
9 Motion because their request is reasonable and supported by good cause.

10 Specifically, undersigned counsel continue to work in cooperation to prepare the joint
11 pretrial order. Defendant’s counsel was out of the country for planned travel from March 25
12 through April 1, and Plaintiff’s counsel was ill for approximately ten days and then engaged in an
13 out-of-state deposition that unexpectedly went into an unplanned, additional day. The Order has
14 taken Plaintiff’s counsel more time to prepare than initially expected, as she was not involved in
15 the litigation or discovery before the matter was appealed, and the attorney previously handling
16 the matter is no longer with the firm. The requested extension will not affect any other deadlines
17 or hearings, as no other deadlines or hearings have been set.

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1 **III. CONCLUSION**

2 Again, the parties take seriously the current deadlines and for that reason are requesting
 3 less than an additional week to complete this task, and represent, as noted above, that they do not
 4 plan to seek any further extension of this deadline. The Parties make this request in good faith
 5 and not to delay these proceedings. Therefore, the Parties respectfully request that the Court
 6 grant this Motion, and allow the Parties until April 10, 2024, in which to file a joint pretrial order.

7 DATED: April 5, 2024.

8 SNELL & WILMER L.L.P.

MARQUIS AURBACH

10 /s/ Kelly H. Dove

/s/ Nick D. Crosby

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17 *Attorneys for Plaintiff*

Attorney for Defendants

18 **ORDER**

19 IT IS SO ORDERED.

20 Dated: April 5, 2024.

21 
 22 U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2024, I electronically transmitted the above document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter, all counsel being registered to receive Electronic Filing.

/s/ Maricris Williams

An employee of Snell & Wilmer L.L.P.

4894-3029-4708.1

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